

1 WRIGHT, FINLAY & ZAK, LLP  
2 Darren T. Brenner, Esq.  
3 Nevada Bar No. 8386  
4 Lindsay D. Dragon, Esq.  
5 Nevada Bar No. 13474  
6 7785 W. Sahara Ave., Suite 200  
7 Las Vegas, NV 89117  
8 (702) 637-2345; Fax: (702) 946-1345  
9 [dbrenner@wrightlegal.net](mailto:dbrenner@wrightlegal.net)  
10 [ldragon@wrightlegal.net](mailto:ldragon@wrightlegal.net)

11 *Attorneys for Plaintiff, U.S. Bank National Association, as Trustee, Successor in Interest to Bank*  
12 *of America, National Association as Successor by Merger to LaSalle Bank National Association,*  
13 *as Trustee for Certificateholders of Bear Stearns Asset Backed Securities I LLC, Asset-Backed*  
14 *Certificates, Series 2005-HE6*

15 **UNITED STATES DISTRICT COURT**  
16 **DISTRICT OF NEVADA**

17 U.S. BANK NATIONAL ASSOCIATION,  
18 AS TRUSTEE, SUCCESSOR IN INTEREST  
19 TO BANK OF AMERICA, NATIONAL  
20 ASSOCIATION AS SUCCESSOR BY  
21 MERGER TO LASALLE BANK  
22 NATIONAL ASSOCIATION AS TRUSTEE  
23 FOR CERTIFICATEHOLDERS OF BEAR  
24 STEARNS ASSET BACKED SECURITIES I  
25 LLC, ASSET-BACKED CERTIFICATES,  
26 SERIES 2005-HE6,

27 Plaintiff,

28 vs.

FIDELITY NATIONAL TITLE GROUP,  
INC.; FIDELITY NATIONAL TITLE  
INSURANCE COMPANY; DOE  
INDIVIDUALS I through X; and ROE  
CORPORATIONS XI through XX, inclusive,

Defendants.

Case No.: 2:20-cv-01955-KJD-VCF

**STIPULATION AND ORDER TO  
EXTEND TIME TO RESPOND TO  
MOTION TO DISMISS [ECF No. 45]**

**(Fourth Request)**

Plaintiff, U.S. Bank National Association, as Trustee, Successor in Interest to Bank of  
America, National Association as Successor by Merger to LaSalle Bank National Association, as  
Trustee for Certificateholders of Bear Stearns Asset Backed Securities I LLC, Asset-Backed  
Certificates, Series 2005-HE6 (“U.S. Bank”) and Defendant Fidelity National Title Insurance

Company ("Fidelity"), by and through their counsel of record, hereby stipulate and agree as follows:

1. On May 22, 2023, Fidelity filed a Motion to Dismiss [ECF No. 45];
2. U.S. Bank's deadline to respond to Fidelity's Motion to Dismiss is currently July 10, 2023 [ECF No. 57];
3. U.S. Bank's counsel is requesting a one (1) week extension until Monday, July 17, 2023, to file its response to the pending Motion to Dismiss;
4. This Court has previously granted other extensions. U.S. Bank's counsel reasonably believed it could comply with those extensions, but its lead counsel was recently rendered immobile by a back injury for several days preceding this request;
5. Counsel for Fidelity does not oppose the requested extension;
6. This is the fourth request for an extension which is made in good faith and not for purposes of delay.

**IT IS SO STIPULATED.**

DATED this 10<sup>th</sup> day of July, 2023.

DATED this 10<sup>th</sup> day of July, 2023.

WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

/s/ Lindsay D. Dragon

/s/ Kevin Sinclair

Lindsay D. Dragon, Esq.  
Nevada Bar No. 13474  
7785 W. Sahara Ave., Suite 200  
Las Vegas, NV 89117  
*Attorneys for Plaintiff*

Kevin Sinclair, Esq.  
Nevada Bar No. 12277  
16501 Venture Boulevard, Suite 400  
Encino, California 91436  
*Attorneys for Defendants*

**IT IS SO ORDERED.**

Dated: 07/10/2023



UNITED STATES DISTRICT COURT JUDGE